

## REMARKS

Claim 1 has been rejected as anticipated by Layne USP 1,854,517 and by Broome 6,305,468. Since neither reference has been applied to claim 3, claims 3 and 1 have been combined to remove these two references from further consideration. The dependency of claim 12 has been changed from claim 3 to claim 1.

The application of Echols USP 6,941,652 is traversed. This reference welds the filter 40 to the shroud 42 and then rolls that assembly into a cylinder and seam welds that assembly (column 6 lines 27-32). After that the base pipe 38 is inserted in the welded assembly of the filter and shroud and annular welds 58 hold the screen and shroud to the base pipe. While Echols' assembly is expanded downhole from the base pipe, the filter is already attached to the base pipe when expansion happens. The method of claim 1 is to use expansion to secure the filter to the base pipe. In Echols, the filter is already secured by welding before any expansion happens. Echols doesn't anticipate claim 1.

Claim 15 is rejected as anticipated by Arterbury USP 5,190,102. In this reference the item 44 is a sintered metal prepack that is first welded to the base pipe 38. After that, the assembly is inserted into screen 42 and weld 48 is applied so that the prepack is retained by the created annulus 54 and weld 48 (column 8 lines 33-49). In claim 15, the material applied to the base pipe holds the filter when heat is applied to the base pipe. In Arterbury, the prepack 44 is first attached to the base pipe 38 with the filter not even being there. It is the attaching of the filter to the base pipe that traps the prepack 44 rather than the prepack in any way connecting the filter to the base pipe. In essence, the filter in Arterbury is simply welded to the base pipe and the presence of the prepack has nothing to do with that connection.

Last, the Examiner declares claim 1 obvious by a combination of Layne USP 1,500,828 and Pogonowski USP 3,885,298. The Layne patent is a filter for downhole use that puts a screen on a perforated base pipe. The Examiner relies on the other reference and suggests that it could be used to join the filter to the base pipe in the manner claimed in claims 1-3, 8, 9, and 12-14. Looking carefully at Pogonowski one sees a hydraulic tool for expanding casing ends with pistons to create an undulating pattern that holds two stands of casing together. This tool is totally inappropriate to join a filter screen to a base pipe. The screen and base pipe are perforated structures that are joined between end

connections. The Pogonowski reference joins casing ends and likely would overpower a perforated structure like a base pipe and filter. The creation of the undulating pattern on a screen likely would rip it to shreds. There is no suggestion to use a casing end jointer for attaching delicate structures like a filter to a base pipe in between end joints on the base pipe. Claim 1 is not obvious in view of this combination.

Respectfully submitted,

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